

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

MOHAMAD HAMADE

)
) **04 CR 10214 GAO**
)
) CASE NO.

) VIOLATIONS:

) 18 U.S.C. § 1001 --

) False Statements

) 18 U.S.C. § 1546(a) --

) Fraud and Misuse of Visas,

) Permits and Other Documents

) (2 counts)
)

INDICTMENT

COUNT ONE: (18 U.S.C. § 1001 -- False Statements)

The Grand Jury charges that:

On or about January 4, 2000, at Boston, in the District of Massachusetts,

MOHAMAD HAMADE,

defendant herein, in a matter within the jurisdiction of the Immigration and Naturalization Service, later renamed Immigration and Customs Enforcement, of the United States, did knowingly and willfully make a false, fraudulent, and fictitious material statement and representation; that is, that he had never been married, whereas Hamade knew and believed that he had been previously married.

All in violation of Title 18, United States Code, Section 1001.

COUNT TWO: (18 U.S.C. § 1546(a) -- Fraud and Misuse of Visas, Permits and Other Documents)

The Grand Jury further charges that:

On or about December 1, 2002, at Springfield, in the District of Massachusetts,

MOHAMAD HAMADE,

defendant herein, did knowingly subscribe as true under penalty of perjury under 28 U.S.C. § 1746 a false statement with respect to a material fact in an application, to wit, Form N-400, Application for Naturalization, that is, that he had only ever been married once, which said statement the defendant then and there knew was false, in that he had, in fact, been married twice.

All in violation of Title 18, United States Code, Section 1546(a).

COUNT THREE: (18 U.S.C. § 1546(a) -- Fraud and Misuse of Visas, Permits and Other Documents)

The Grand Jury further charges that:

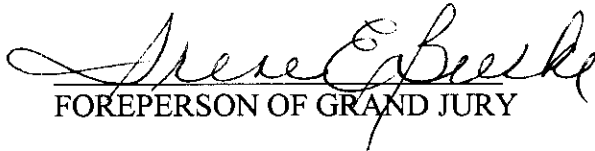
On or about September 4, 2003, at Boston, in the District of Massachusetts,

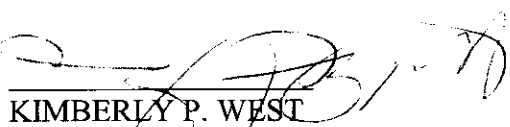
MOHAMAD HAMADE,

defendant herein, did knowingly make under oath a false statement he had previously made with respect to a material fact in an application, to wit, Form N-400, Application for Naturalization, that is, that he had only ever been married once, which said statement the defendant then and there knew was false, in that he had, in fact, been married twice.

All in violation of Title 18, United States Code, Section 1546(a).

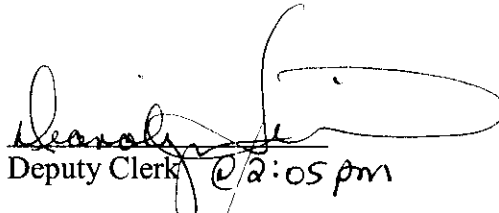
A TRUE BILL


FOREPERSON OF GRAND JURY


KIMBERLY P. WEST
GREGORY T. MOFFATT
Assistant U.S. Attorneys

DISTRICT OF MASSACHUSETTS, Boston, July 21, 2004

Returned into the District Court by the Grand Jurors and filed.


Deputy Clerk @ 2:05 pm